

CERTIFIED COPY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, INC., a California
Corporation,

Plaintiff,

vs.

No. C 538 049

DAVID JORDAN, LAW OFFICES OF EBERLE &
JORDAN, DOES 1 through 10,
inclusive,

Defendants.

DEPOSITION OF CYNTHIA MORROW, a witness herein, taken
by the Defendants David Jordan and Law Offices of
Eberle & Jordan, at 201 Santa Monica Boulevard, Santa
Monica, California, at 9:30 a.m., Tuesday, October 29,
1985, before Andrea P. Jeanmenne, CSR 6397, RPR, CP
and Notary Public.

INDEX

Hutchings Number: OLA-5656-85

DEPOSITION BY:



RENDEL B HUTCHINGS CSR 649
Certified Shorthand Reporters

1416 North Figueroa Street Los Angeles, California 90015-2401

EXHIBIT U PAGE 145

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SANTA MONICA
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1 your best recollection and a wild guess?

2 A. Yes.

3 Q. Okay.

4 Do you know of any reason why you cannot give your
5 best testimony today?

6 A. No.

7 Q. Have you taken anything of an alcoholic nature
8 during the past 12 hours?

9 A. No.

10 Q. Are you currently taking any medication
11 prescribed by a doctor?

12 A. No.

13 Q. Have you taken anything of a narcotic or
14 medication during the past 12 hours?

15 A. No.

16 Q. Do you have any questions before we begin?

17 A. No.

18 Q. Before coming here today, did you have an
19 opportunity to speak to Mr. Peterson or an attorney with the
20 church regarding the deposition procedure?

21 A. Yes.

22 Q. Do you feel comfortable with proceeding at this
23 time?

24 A. Yes.

25 Q. My understanding is that you have been
26 designated by the church as a managing agent of the Church of
27 Scientology of California. Is that also your understanding?

28 A. Yes.

1 Q. Do you presently have an official title in the
2 church? When I say "church," I am referring to only the
3 Church of Scientology of California, not to any other church.
4 Do you understand that?

5 A. Yes.

6 Q. Do you hold any titles in the Church of
7 Scientology of California?

8 A. Corporate titles?

9 Q. Any title whatsoever?

10 A. I hold the legal division secretary title.

11 Q. Legal division secretary?

12 A. Uh-huh.

13 Q. Is that "Yes"?

14 A. Yes.

15 Q. A few other ground rules. The court reporter
16 can only take down the spoken word. She cannot take down
17 nods of the head, "Uh-huh," "Huh-uh," mutterings. So as the
18 deposition progresses and you get tired and I get tired, if I
19 ask you to speak audibly, don't be offended. I am just
20 reminding you that we have to have a record and the court
21 reporter has to have a verbal response. Okay?

22 A. Okay.

23 Q. So your title is legal division secretary?

24 A. Yes.

25 Q. How long have you had that title?

26 A. Since the end of May.

27 Q. 1985?

28 A. Yes.